



Legal Issues Regarding the Implementation of Traffic "Calming" and Neighborhood Parking Control Measures

prepared and presented by

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Legal Issues Regarding the Implementation of Traffic "Calming" and Neighborhood Parking Control Measures

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I. Authority and Criteria for Implementing Traffic Control Measures

A. *Traffic Control Device vs. Roadway Design Feature*

- Traffic measures that involve a physical addition or alteration to a roadway generally fall into two categories:
 - a. an official traffic control device; or
 - b. a roadway design feature.

- An "official traffic control device" is defined in Vehicle Code Section 440 as follows:

"‘An official traffic control device’ is any sign, signal, marking or device, consistent with Section 21400, placed or erected by authority of a public body or official having jurisdiction, for the purpose of regulating, warning or guiding traffic, but does not include islands, curbs, traffic barriers, speed humps, speed bumps, or other roadway design features."

- The term "roadway design feature" is not a defined term but has been interpreted by the courts as usually being relatively permanent, physical changes in the width or

alignment of roadways that are effected by islands, strips, shoulders, and curbs. (*Rumford v. City of Berkeley*, 31 Cal.3d 545, 556-57 (1982).)

- Prior to 1983, the Vehicle Code and court decisions were strictly interpreted to preclude any traffic barrier designed to impede the flow of through traffic on streets used for public vehicular use. (*Rumford*; Vehicle Code Section 21.) Vehicle Code Section 21401 still provides in relevant part:

“(a) Except as provided in Section 21374 [relating to directional signs for tourists] only those official traffic control devices that conform to the uniform standards and specifications promulgated by the Department of Transportation shall be placed upon a street or highway. . . .”

- Under current law, “islands, curbs, traffic barriers, speed humps, speed bumps, or other roadway design features” are not “official traffic control devices.” (Vehicle Code Section 440.) Instead, cities have categorized and then installed these devices as “roadway design features.” Cities have the authority to construct and maintain streets within their jurisdiction pursuant to the city’s constitutional “police power”. (*City of Walnut Creek v. Silveira*, 47 Cal.2d 804, 812 (1957).)
- In the absence of direct authority from the Vehicle Code to erect various types of traffic diverters and barriers, there is continuing uncertainty as to the legality of certain measures that do not involve a basic structural change to a street and are installed upon a street for the principal purpose of controlling traffic.

B. Traffic Barriers

- The *Rumford* court held that traffic barriers designed to block streets to through traffic and to otherwise reduce traffic impacts on residential neighborhoods were not “official traffic

control devices," and could not be installed by cities because they were not authorized by the Vehicle Code.

- The Vehicle Code was subsequently amended and now provides that traffic barriers are not "official traffic control measures" but rather roadway design features. (Vehicle Code Section 440.) As a roadway design feature, cities are not preempted from utilizing these barriers provided certain procedural steps are followed before installing them.

- Vehicle Code Section 21101 provides in relevant part:

"Local authorities, for those highways under their jurisdiction, may adopt rules and regulations by ordinance or resolution on the following matters:

. . .

(f) Prohibiting entry to, or exit from, or both, from any street by means of islands, curbs, traffic barriers, or other roadway design features to implement the circulation element of a general plan adopted pursuant to Article 6 (commencing with Section 65350) of Chapter 3 of Division 1 of Title 7 of the Government Code. The rules and regulations authorized by this subdivision shall be consistent with the responsibility of local government to provide for the health and safety of its citizens."

- Traffic barriers that effect a partial or complete closure of a regionally significant roadway exceed a city's authority under Vehicle Code Section 21101(f). (*City of Poway v. City of San Diego*, 229 Cal.App.3d 847 (1991) and *City of Hawaiian Gardens v. City of Long Beach*, 61 Cal.App. 4th 1100 (1998).)
- A traffic barrier proposed to be installed pursuant to Vehicle Code Section 21101(f) should be:

- a. based on a design approved by a traffic engineer in order to provide "design immunity" to the city;
- b. generally authorized by language in the circulation element of the city's general plan;
- c. constructed, sited and managed in accordance with rules and standards contained in a program approved by ordinance or resolution of the city council;
- d. approved in compliance with CEQA; and
- e. not involve a regionally significant roadway.

C. *Complete Closures (Permanent or Temporary)*

- A complete permanent closure of a local street or local street segment to all traffic is authorized by Vehicle Code Section 21101(a) when, in the opinion of the city council, the highway is no longer needed for any vehicular traffic. Closure may be prohibited if the street is regionally significant. (*Poway, supra* and *Hawaiian Gardens, supra*.)
- A complete temporary closure of a street or street segment is authorized for special occasions or events (Section 21101(e)), when necessary for safety of persons using the street (Section 21101(e)), when there is gridlock (Section 21101.2), when there is serious and continual criminal activity in the street, and to address other specified problems and issues (see Vehicle Code Sections 21101 and 21102).

D. *Gating (Selected Closure Based on Residency)*

- Gating a public street to allow residents whose properties are accessed from the street to obtain access but to deny non-residents the same access is not permitted. (Vehicle Code Section 21101.6; *City of Lafayette v. County of Contra Costa*, 91 Cal.App.3d 749 (1979); *Citizens Against Gated Enclaves v. Whitley Heights Civic Assn.*, 23 Cal.App.4th 812 (1994).)

E. *Privatizing Public Streets*

- A public street may only be abandoned, and thereby potentially converted to private use, pursuant to the provisions of the California Streets and Highways Code. Section 8324 of that Code provides that a city may vacate a public street if the city council, after a public hearing, determines that the street is unnecessary for "present or prospective public use." (California Streets and Highways Code Section 8324(b).)
- A city council may have difficulty making the required finding with regard to the streets of an occupied residential subdivision. Even if no street provides access to areas outside of the subdivision, the streets are used by the residents of the subdivision to access their properties. Therefore, in order to safely make the finding required by Section 8324, a city would need to have the consent of all property owners who would be required to maintain the proposed private streets and would need to ensure that after vacation of the public streets, all property owners would continue to have access to their property through CC&Rs.

F. *Speed Humps*

- Speed humps and speed bumps are not "official traffic control devices." Rather, Vehicle Code Section 440 categorizes them as "other roadway design features." Thus, most cities have taken the position that they can be installed without specific Vehicle Code authority or conformance to state standards. The authority to install speed bumps remains subject to some risk of challenge on the basis that they are placed on a street as a traffic control measure without specific Vehicle Code authority. The courts and the California Attorney General have yet to rule on this issue.
- In considering the installation of speed bumps, it would be advisable for a city to:
 - a. base the design and proposed locations on recognized engineering standards as approved by

- a traffic engineer in order to provide "design immunity" to the city;
- b. make sure the circulation element of the city's general plan does not conflict with a speed hump program;
- c. provide that the speed humps are constructed, sited and managed in accordance with rules and standards contained in a program approved by ordinance or resolution of the city council; and
- d. ensure that the process of approving the speed humps is done in compliance with CEQA.

G. "Cul-de-sacing" and Narrowing

- Although the purpose of installing a pair of cul-de-sacs or narrowing a street may be expressly for traffic control and diversion purposes, these improvements are permanent physical improvements that are roadway design features not precluded by the Vehicle Code. (See *Carsten v. City of Del Mar*, 8 Cal.App.4th 1642 (1992).)
- A city does not need to find that the street is no longer needed for vehicular use pursuant to Vehicle Code Section 21101 (a)(1) in order to block through traffic on the street by way of cul-de-sacs placed in the middle of a segment of the street. Through traffic on a street can be blocked by cul-de-sacs as a "roadway design feature," pursuant to Vehicle Code Section 21101 (f), as long as creating the cul-de-sacs on the street is consistent with the circulation element of the city's general plan. (*Save the Sunset Strip Coalition v. City of West Hollywood*, 87 Cal.App.4th 1172 (2001)).
- Consideration and approval of "cul-de-sacing" a street should be consistent with the general plan's designation for the affected street, be designed in accordance with established standards, be approved by the city council and accomplished in compliance with CEQA.

H. *Bollards*

- A bollard is not an official traffic control device but can be construed as a "traffic barrier" and thus a roadway design feature. This interpretation relies on construing a set of bollards as being similar to a permanent physical improvement to a roadway. The more permanent and immobile the bollard design and installation, the greater likelihood that it will be found to be a roadway design feature and not a traffic control device.
- If bollards are to be used as temporary or permanent "traffic barriers," the same procedural elements set forth in Section B above should be followed.

I. *Preferential Parking*

- Preferential parking is authorized by Vehicle Code Section 22507. An ordinance or resolution establishing a preferential parking zone or district should contain findings showing why the designated zone or district is necessary to reduce traffic congestion and provide space for parking by adjacent property owners. A preferential parking zone or district designed merely to either preclude non-residents from parking on a street or to allow residents to park on streets longer than the posted limit, but where the street is not already congested, is subject to a risk of court invalidation on the grounds that the program violates the equal protection rights of non-residents. (See ***County Board of Arlington City v. Richards*** (1977) 434 U.S. 5, 54 L.Ed.2d 4, 98 S.Ct. 24 (1977); ***Commonwealth v. Petralia***, 362 N.E.2d 513 (1977).)
- A preferential parking permit program need not require permit holders to park only in spaces immediately adjacent to their property. "General adjacency" is permitted. (***Boccatto v. City of Hermosa Beach***, 158 Cal.App.3d 804 (1984).)
- A preferential parking ordinance does not have to allow for the issuance of permits for businesses located within the

boundaries of the district or zone. (*Friedman v. City of Beverly Hills*, 47 Cal.App.4th 436 (1996).)

II. General Plan Compliance

- In any process to formulate and implement traffic control measures, one of the first steps is to ensure that the proposed measures and their locations will not conflict with the city's general plan.
- Street closures, street narrowing, speed humps and other measures designed to restrict vehicular traffic along particular streets must be consistent with the circulation element of the general plan with respect to the planned capacity and designation of the street. (*Uhler v. City of Encinitas*, 227 Cal.App.3d 795 (1991) and *Save the Sunset Strip Coalition*, *supra*.)

III. Compliance with the California Environmental Quality Act

- Early recognition and then careful compliance with CEQA is one of the most important ways to ensure that a traffic control measure will withstand a court challenge if such challenge is ever brought. If possible, consider city-wide solutions so that the implementation can justify the cost of an EIR. This will help to ensure the analysis is comprehensive and defensible and will avoid the necessity of preparing a series of separate focused EIRs or separate detailed Mitigated Negative Declarations.

IV. Potential Liability for Implementation or Installation of Traffic Measures

- There are four prerequisites to establishing liability of a public entity for a traffic control device or roadway design feature:
 - a. The traffic control device or roadway design feature created a "dangerous condition" of public property.
 - b. The traffic control device or roadway design feature was the proximate cause of the accident;
 - c. The kind of injury that occurred was reasonably foreseeable as a consequence of the dangerous condition;
 - d. Either the dangerous condition was created by the city's act or omission or the city had actual or constructive notice of the condition a sufficient time before the injury occurred to have taken reasonable measures to protect against such injury.

(See Government Code Section 835.)

V. Immunities for Injuries Resulting from Implementation and Operation of Traffic Measures

- Government Code Section 835.4(a) provides that a public entity is not liable for injury caused by a condition of its property if the public entity establishes that the act or omission that created the condition was "reasonable." Thus, the City must prove that the installations were carefully considered by it and that there was a rational basis for deciding "yes" in one instance and "no" in another yet similar instance.
- Plan or Design Immunity (Government Code Section 830.6) is an affirmative defense to liability for a dangerous condition of public property even if the design is defective. Design immunity is available if three basic elements are satisfied: (1) a causal

relationship between the plan or design and the accident; (2) the design's approval in advance of construction by a legislative body or officer exercising discretionary authority; and (3) a court finding of substantial evidence of the design's reasonableness. (*Davis v. Cordova Recreation & Park District*, 24 Cal.App.3d 789, 794 (1972).)

- In a "design immunity" case, the key issue is not whether a trial court or a jury could find the design unreasonable based on conflicting expert evidence, but whether there is any reasonable basis on which a reasonable public official could initially have approved the design. (*Compton v. City of Santee*, 12 Cal.App.4th 591 (1993).)
- A design immunity defense can be overcome by the injured party if the conditions at the time of the accident were different from the conditions prevailing when the plan was approved. (*Compton*.)
- An accident history resulting from the device or feature can also overcome a design immunity defense if the accident rate is "statistically aberrant," i.e., unusual or excessive in some respect. In *Compton*, the court held that one accident per year in an intersection carrying 4.5 million vehicles per year is "sufficiently beyond ordinary statistical probabilities" (not sufficient) to alert the city of the dangerous nature of the intersection. The statistical analysis will depend upon the type of intersection, the type of accidents that occur, the volume of traffic on the street and other unique factors involving the street.

BIOGRAPHY

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KEVIN G. ENNIS

Mr. Ennis is a partner of Richards, Watson & Gershon and has been practicing law in the firm's public law department for fifteen years. Mr. Ennis has broad experience in all facets of municipal law, having worked as a planning and transportation commission attorney on behalf of communities with diverse legal requirements. He is also among the state's experts in the Political Reform Act and other conflict of interest statutes.

Mr. Ennis serves as the City Attorney of the City of Artesia (1997—present) and the Assistant City Attorney of the City of Rancho Cucamonga (1999-present). Over the years, Mr. Ennis has also served as City Attorney of Carson (1999—2001) and as Assistant City Attorney or Deputy City Attorney for Beverly Hills (1987—1990), Artesia (1989—1997), Rolling Hills (1989—1999), Palmdale (1991—1995), and Cudahy (1993—1995).

Mr. Ennis has participated in numerous seminars for public officials and lawyers on such topics as legal issues involving neighborhood traffic controls (UCLA Extension — 1996 and League of California Cities — 1997), mansionization (League of California Cities—1989), and advanced issues involving the Sub-division Map Act (UCLA Extension—annually since 1993).

Mr. Ennis is a member of the California and Los Angeles County Bar Associations and is the former President of the State and Local Government Law Section of the Los Angeles County Bar Association. He is also a past President of the Claremont McKenna College Alumni Association.

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POWERPOINT SLIDES

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Parking Control Measures

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Vehicle Code Section 21 provides that:

"Except as otherwise expressly provided, the provisions of this Code [the California Vehicle Code] are applicable and uniform throughout the State and in all counties and municipalities therein, and no local authority shall enact or enforce any ordinance on the matters covered by this code unless expressly authorized herein."

Traffic measures that involve a physical addition or alteration to a roadway generally fall into two categories:

- (a) an official traffic control device;
or
- (b) a roadway design feature.

Vehicle Code Section 21401 still provides in relevant part:

"(a) Except as provided in Section 21374 [relating to directional signs for tourists] only those official traffic control devices that conform to the uniform standards and specifications promulgated by the Department of Transportation shall be placed upon a street or highway. . . ."

"An official traffic control device' is any sign, signal, marking, or device, consistent with Section 21400, placed or erected by authority of a public body or official having jurisdiction, for the purpose of regulating, warning, or guiding traffic, but does not include islands, curbs, traffic barriers, speed humps, speed bumps, or other roadway design features."

(Vehicle Code Section 440)

The term "roadway design feature" is not a defined term but has been interpreted by the courts as being a relatively permanent, physical change in the width or alignment of roadways that are effected by islands, strips, shoulders, and curbs.

(Rumford v. City of Berkeley, 31 Cal.3d 545, 556-57 (1982)).

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"Local authorities, for those highways under their jurisdiction, may adopt rules and regulations by ordinance or resolution on the following matters:

. . .

(f) Prohibiting entry to, or exit from, or both, from any street by means of islands, curbs, traffic barriers, or other roadway design features to implement the circulation element of a general plan . . . "

A traffic barrier proposed to be installed pursuant to Vehicle Code Section 21101 (f) should be:

- a. based on a design approved by a traffic engineer in order to provide "design immunity" to the City;
- b. generally authorized by language in the circulation element of the city's general plan;

- c. constructed, sited and managed in accordance with rules and standards contained in a program approved by ordinance or resolution of the city council;
- d. approved in compliance with CEQA; and
- e. not involve a regionally significant roadway.

Permanent Closures

A complete permanent closure of a local street or local street segment to all traffic is authorized by Vehicle Code Section 21101 (a) when, in the opinion of the city council, the highway is no longer needed for any vehicular traffic. Closure may be prohibited if the street is regionally significant (Poway, supra.)

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(See Vehicle Code Sections 21101 and 21102.)

Gating (Selected Closure Based on Residency)

Gating a public street to allow residents whose properties are accessed from the street to obtain access but to deny non-residents the same access is not permitted (Vehicle Code Section 21101.6; City of Lafayette v. County of Contra Costa, 91 Cal.App.3d 749 (1979); Citizens Against Gated Enclaves v. Whitley Heights Civic Assn., 23 Cal.App.4th 812 (1994.))

Privatizing Public Streets

A public street may only be abandoned, and thereby potentially converted to private use, if City Council, after a public hearing, determines that the street is unnecessary for "present or prospective public use." (California Streets and Highways Code Section 8324(b.))

Speed Humps

In considering the installation of speed humps, it would be advisable for a city to:

- a. base the design and proposed locations on recognized engineering standards as approved by a traffic engineer in order to provide "design immunity" to the city;
- b. make sure the circulation element of the city's general plan does not conflict with a speed hump program;

- c. provide that the speed humps are constructed, sited and managed in accordance with rules and standards contained in a program approved by ordinance or resolution of the city council; and
- d. ensure that the process of approving the speed humps is done in compliance with CEQA.

"Cul-de-sacing" and Narrowing

Although the purpose of installing a pair of cul-de-sacs or narrowing a street may be expressly for traffic control and diversion purposes, these improvements are permanent physical improvements that are roadway design features not precluded by the Vehicle Code.

(See Carsten v. City of Del Mar,
8 Cal. App. 4th 1642 (1992.))

Consideration and approval of "cul-de-sacing" a street should be consistent with the general plan's designation for the affected street, be designed in accordance with established standards, be approved by the city council and accomplished in compliance with CEQA. (Save the Sunset Strip Coalition v. City of West Hollywood, 87 Cal.App.4th 1172 (2001))

Preferential Parking

An ordinance or resolution establishing a preferential parking zone or district should contain findings showing why the designated zone or district is necessary to reduce traffic congestion and provide space for parking by adjacent property owners.

A preferential parking zone or district designed merely to either preclude non-residents from parking on a street or to allow residents to park on streets longer than the posted limit, but where the street is not already congested, is subject to a risk of court invalidation on grounds that the program violates the equal protection rights of non-residents. (See County Board of Arlington City v. Richards (1977) 434 U.S.5, 54 L.Ed.2d 4, 98 S.Ct.24 (1977); Commonwealth v. Petralia, 362 N.E.2d 513 (1977).))

A preferential parking permit program need not require permit holders to park only in spaces immediately adjacent to their property. "General adjacency" is permitted. (Boccatto v. City of Hermosa Beach, 158 Cal.App.3d 804 (1984).))

A preferential parking ordinance does not have to allow for the issuance of permits for businesses located within the boundaries of the district or zone. (Friedman v. City of Beverly Hills, 47 Cal.App.4th 436 (1996.))

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In any process to formulate and implement traffic control measures, one of the first steps is to ensure that the proposed measures and their locations will not conflict with the city's general plan.

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Compliance with the California Environmental Quality Act

Early recognition and then careful compliance with CEQA is one of the most important ways to ensure that a traffic control measure will withstand a court challenge if such a challenge is ever brought. If possible, consider city-wide solutions so that the implementation can justify the cost of an EIR.

Potential Liability for Implementation or Installation of Traffic Measures

There are four prerequisites to establishing liability of a public entity for a traffic control device or roadway design feature:

1. The traffic control device or roadway design feature created a "dangerous condition" of public property;
2. The traffic control device or roadway design feature was the proximate cause of the accident;

3. The kind of injury that occurred was reasonably foreseeable as a consequence of the dangerous condition;
4. Either the dangerous condition was created by the city's act or omission or the city had actual or constructive notice of the condition a sufficient time before the injury occurred to have taken reasonable measures to protect against such injury.

(Government Code Section 835)

Design immunity is available if three basic elements are satisfied: (1) a casual relationship between the plan or design and the accident; (2) the design's approval in advance of construction by a legislative body or officer exercising discretionary authority; and (3) a court finding of substantial evidence of the design's reasonableness (Davis v. Cordova Recreation & Park District, 24 Cal.App.3d 789, 794 (1972))

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